

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**COVER SHEET FOR SECOND MONTHLY FEE STATEMENT OF FTI
CONSULTING, INC. FOR COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF TALC CLAIMANTS FOR THE PERIOD FROM
MAY 1, 2023 THROUGH AND INCLUDING MAY 31, 2023**

Debtor: LTL Management LLC	Applicant: FTI Consulting, Inc. ("FTI")
Case No: Case No. 23-12825 (MBK)	Client: The Official Committee of Talc Claimants
Chapter: 11	Case Filed: April 4, 2023

COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY PURSUANT TO 28 U.S.C. § 1746.

FINAL RETENTION ORDER ATTACHED (EXHIBIT A)

<u>/s/ Matthew Diaz</u>	<u>7/26/2023</u>
Matthew Diaz	Date

<p style="text-align: center;">SECTION I FEE SUMMARY</p>
--

Summary of the Amounts Requested for the Period from
May 1, 2023 through May 31, 2023 (the "Fee Period")

Fee Total:		\$1,060,395.00
Disbursement Total ¹		\$593.21
Total Fees Plus Disbursements		<u>\$1,060,988.21</u>
Less: 20% Holdback		<u>(\$212,079.00)</u>
Total Sought at this Time		<u><u>\$848,909.21</u></u>

Summary of Amounts Requested for Previous Periods

	FEES	EXPENSES
Total Previous Fee Requested:	\$271,674.75	\$0.00
Total Fees Allowed To Date:	\$0.00	\$0.00
Total Received By Applicant:	\$217,339.80	\$0.00
Total Approved Amounts – Unpaid:	\$0.00	\$0.00
Total Holdback:	\$54,334.95	\$0.00

¹ FTI reserves the right to request, in subsequent fee statements, reimbursement of any additional expenses incurred during the Fee Period, as such expenses may not have been captured in FTI's billing system as of the date of filing this Fee Statement.

Professional	Position	Billing Rate	Total Hours	Total Fees
<u>Restructuring</u>				
Diaz, Matthew	Senior Managing Director	\$1,325	49.6	\$65,720.00
Tully, Conor	Senior Managing Director	1,325	63.1	83,607.50
Berkin, Michael	Managing Director	1,055	68.9	72,689.50
Khan, Baber	Senior Director	925	73.0	67,525.00
Eisenberg, Jacob	Senior Consultant	695	137.0	95,215.00
Kim, Andrew	Consultant	475	2.0	950.00
Scheff, William	Consultant	475	177.2	84,170.00
Hellmund-Mora, Marili	Manager	325	0.6	195.00
RESTRUCTURING SUBTOTAL			571.4	\$470,072.00
<u>Economics</u>				
Heeb, Randal	Senior Managing Director	\$1,450	5.3	\$7,685.00
Kubali, Volkan	Managing Director	1,210	26.2	31,702.00
Watson, Ching	Managing Director	1,210	20.2	24,442.00
ECONOMICS SUBTOTAL			51.7	\$63,829.00
<u>Strategic Communications</u>				
Mehan, Zachary	Managing Director	\$875	22.3	\$19,512.50
Staples Miller, Citseko	Managing Director	875	32.5	28,437.50
Izen, Alex	Senior Director	650	1.1	715.00
Labkoff, Nicole	Director	650	67.0	43,550.00
Negron, Sabrina	Director	650	26.7	17,355.00
Rivera, Jacqueline	Director	650	14.8	9,620.00
Brauer, Meagan	Director	600	15.7	9,420.00
Ash, Alexa	Senior Consultant	525	12.3	6,457.50
Weltman, Allison	Senior Consultant	525	16.3	8,557.50
Gregoire, Merzulie	Consultant	400	35.2	14,080.00
Hardey, Samantha	Consultant	400	12.1	4,840.00
STRATEGIC COMMUNICATIONS SUBTOTAL			256.0	\$162,545.00
<u>Compass Lexecon</u>				
Austin Smith, Yvette	Senior Managing Director	\$1,250	25.7	\$32,125.00
Polonsky, Jonathan	Senior Vice President	965	1.5	1,447.50
Rinaudo, Alexander	Senior Vice President	965	251.2	242,408.00
Pauwels, David	Senior Analyst	685	4.0	2,740.00
Azuero, Brandon Waye	Senior Analyst	585	102.1	59,728.50
Tai, Nikki	Analyst	510	50.0	25,500.00
COMPASS LEXECON SUBTOTAL			434.5	\$363,949.00
GRAND TOTAL			1,313.6	\$1,060,395.00

**SECTION II
SUMMARY OF SERVICES**

Task Code	Task Description	Total Hours	Total Fees
1	Current Operating Results & Events	53.5	\$35,932.50
11	Prepare for and Attendance at Court Hearings	14.2	10,930.00
12	Analysis of SOFAs & SOALs	90.0	63,409.00
13	Analysis of Other Miscellaneous Motions	7.1	6,472.50
14	Analysis of Claims/Liabilities Subject to Compromise	234.3	188,220.50
16	POR & DS - Analysis, Negotiation and Formulation	39.2	40,533.50
18	Potential Avoidance Actions & Litigation Matters	74.5	70,036.50
19	Case Management	11.4	10,274.00
21	General Meetings with Committee & Committee Counsel	35.2	40,479.50
22	Meetings with Other Parties	4.2	3,471.00
23	Firm Retention	32.4	23,605.00
24	Preparation of Fee Application	16.7	8,546.50
26	Communicatons	265.6	178,010.00
27	Mesothelioma Claims Estimation	158.6	154,837.50
29	Ovarian Claims Estimation	276.7	225,637.00
GRAND TOTAL		1,313.6	\$1,060,395.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

Expense Type	Amount
Research Access	\$593.21
Total	\$593.21

**SECTION IV
CASE HISTORY**

- (1) Date case filed: April 4, 2023
- (2) Chapter under which case commenced: Chapter 11
- (3) Date of Retention: April 15, 2023²
- (4) Summarize in brief the benefits to the estate and attach supplements as needed:
 - (a) FTI assisted in the case by assisting Counsel with financial review and analyses, attending court hearings, monitoring and analyzing strategic considerations in relation to the preliminary injunction motion, estimation process, motion to dismiss, and reviewed the Debtor's restructuring transaction.
 - (b) FTI assisted the Committee in understanding and estimating the Debtor's talc liability in connection to the case.
 - (c) FTI evaluated the Debtor's current operating results to assist the Committee in understanding the financial position of the Debtor.
 - (d) FTI participated in regular calls with Counsel and Committee member representatives to discuss status of the case and other topics.
 - (e) FTI provided communications updates to the Committee consisting of media monitoring, a communications website, coordinating the production of Town Hall meetings designed to comply with the Committee's duties to communicate with its constituency pursuant to section 1103 of the Bankruptcy Code, and constituent inquiry management.
 - (f) To the extent not addressed by the foregoing descriptions, FTI performed other services on behalf of the Committee that were necessary and appropriate in this chapter 11 case.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 26, 2023

/s/ Matthew Diaz

Matthew Diaz

² See the Order Authorizing Final Retention of FTI Consulting, Inc. as Financial Advisor to the Official Committee of Talc Claimants Effective April 15, 2023 (Dkt. No. 774) entered on June 14, 2023.